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May 30, 2018

Hon. James Orenstein
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

VIA ECF

Re: Godlewska et al. v. Human Development Association, Inc. et al.
Docket No.: 03-cv-3985 (ADS)(JO)

Dear Judge Orenstein,

I represent Plaintiffs in this matter. I write with the consent of Defense counsel to respectfully request a two week adjournment of a status conference scheduled by Your Honor for tomorrow, May 31, 2018 at 2:00PM.

Earlier today Your Honor expressed a number of concerns with the settlement agreement vis-a-vis the manner in which it was negotiated as well as attorney conduct. Your Honor appeared especially concerned with my conduct. Your Honor also expressed a number of remedies under consideration, which included disqualifying me from representing all Plaintiffs in this matter and Rule 11 sanctions against me. Inasmuch as I believe that, under the circumstances of this case, I acted ethically and properly at all times and in the best interest of my clients in following Your Honor's directives, I would like the opportunity to prepare a complete response. I believe that I will be able to address and allay Your Honor's concerns in writing, given time to collect and review a number of documents, docket entries and order transcripts of conferences held. I may also need to consult with an ethics expert. In a word, I need a reasonable opportunity to prepare a complete written response to the concerns raised by Your Honor.

Consequently, I respectfully request that Your Honor grant a two week adjournment of tomorrow's conference/hearing to June 14, 2018 or to any day thereafter.

Respectfully submitted,

/s/Robert Wisniewski
Robert Wisniewski